

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

**IN RE: THE FINANCIAL
OVERSIGHT AND MANAGEMENT
BOARD FOR PUERTO RICO**

**AS REPRESENTATIVE OF
THE COMMONWEALTH OF
PUERTO RICO *et al***

Debtors¹

**PROMESA
Title III**

No. 17 BK 3283-LTS

(Jointly Administered)

MOTION TO WITHDRAW AS ATTORNEY AND TO CEASE NOTIFICATIONS

TO THE HONORABLE COURT:

COMES NOW the undersigned attorney, and very respectfully states and prays as follows:

1. On July 20, 2017, the undersigned attorney appeared on behalf of Ms. Marcia Gil Caraballo (“Gil”) in case no. 17-4780 (LTS). At the time, Gil was a creditor of one of the debtors in this case, the Puerto Rico Electric Power Authority (“PREPA”), and appeared before this court seeking that the Title III automatic stay be lifted in a civil case she had against PREPA, in order to continue prosecuting her monetary claims against it. *See*, Case No. 17-4780 (LTS), Docket Entries 86 and 87.

2. On October 6, 2017, case no. 17-4780 (LTS) was consolidated with the captioned case. *See*, Case No. 17-4780 (LTS), Docket Entry 340.

¹ The Debtors in these title III cases, along with each Debtor’s respective title III case number listed as a bankruptcy case number due to software limitations and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK-3283 (LTS)) (Last Four Digits of Federal Tax ID: 3481), (ii) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK-3566 (LTS)) (Last Four Digits of Federal Tax ID: 9686), (iii) Puerto Rico Highways and Transportation Authority (Bankruptcy Case No. 17-BK- 3567 (LTS)) (Last Four Digits of Federal Tax ID: 3808), and (iv) Puerto Rico Sales Tax Financing Corporation (Bankruptcy Case No. 17-BK-3284 (LTS)) (Last Four Digits of Federal Tax ID: 8474); and (v) Puerto Rico Electric Power Authority (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747).

3. Gil's request was resolved when she and PREPA stipulated to lift the automatic stay, as set forth in the Omnibus Order at Docket Entry 2945-1, page 5, item 9.

4. Moreover, Gil's civil case against PREPA recently came to an end.

5. As a result, Gil will no longer need to seek any further relief from this court with respect to her civil case against PREPA.

6. The undersigned attorney is currently being notified of all motions, orders and other documents filed in cases no. 17-3283 (LTS) and 17-4780 (LTS). For the foregoing reasons, it is respectfully requested that the court allow the undersigned to withdraw as Gil's counsel and cease its notifications in these cases to the undersigned's e-mail addresses.

WHEREFORE, the undersigned attorney very respectfully requests that the court **GRANT** this motion, allow the undersigned to withdraw as counsel, and cease its notifications to the undersigned's e-mail addresses of all documents filed in this case.

I HEREBY CERTIFY that today this document was filed electronically through the **CM/ECF** system which will send notification to the parties to their registered email addresses.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 1st day of August, 2018.

GONZÁLEZ MUÑOZ LAW OFFICES, PSC
P.O. Box 9024055
San Juan, PR 00902-4055
Tel. 787-766-5052
Fax 787-766-5551
jnieves@gonzalezmunozlaw.com

s/ Juan C. Nieves González
Juan C. Nieves González
USDC-PR No. 231707

Exhibit A

Proposed Order

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

**IN RE: THE FINANCIAL
OVERSIGHT AND MANAGEMENT
BOARD FOR PUERTO RICO**

**AS REPRESENTATIVE OF
THE COMMONWEALTH OF
PUERTO RICO *et al***

Debtors²

**PROMESA
Title III**

No. 17 BK 3283-LTS

(Jointly Administered)

**ORDER GRANTING MOTION TO WITHDRAW AS ATTORNEY AND TO CEASE
NOTIFICATIONS**

This matter is before the court on attorney Juan Nieves González's Motion to Withdraw as Attorney and to Cease Notifications. Finding good cause for the requested relief, this Court **GRANTS** the Motion. Accordingly:

1. Attorney Juan Nieves González is allowed to withdraw as counsel for creditor Marcia Gil Caraballo.
2. Attorney Juan Nieves González will be removed from the list of persons to be notified of all documents electronically filed in this case.

This Order resolves Dkt. No. ____.

Dated: August __, 2018

HON. LAURA TAYLOR SWAIN
UNITED STATES DISTRICT JUDGE

² The Debtors in these title III cases, along with each Debtor's respective title III case number listed as a bankruptcy case number due to software limitations and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK-3283 (LTS)) (Last Four Digits of Federal Tax ID: 3481), (ii) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK-3566 (LTS)) (Last Four Digits of Federal Tax ID: 9686), (iii) Puerto Rico Highways and Transportation Authority (Bankruptcy Case No. 17-BK- 3567 (LTS)) (Last Four Digits of Federal Tax ID: 3808), and (iv) Puerto Rico Sales Tax Financing Corporation (Bankruptcy Case No. 17-BK-3284 (LTS)) (Last Four Digits of Federal Tax ID: 8474); and (v) Puerto Rico Electric Power Authority (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747).